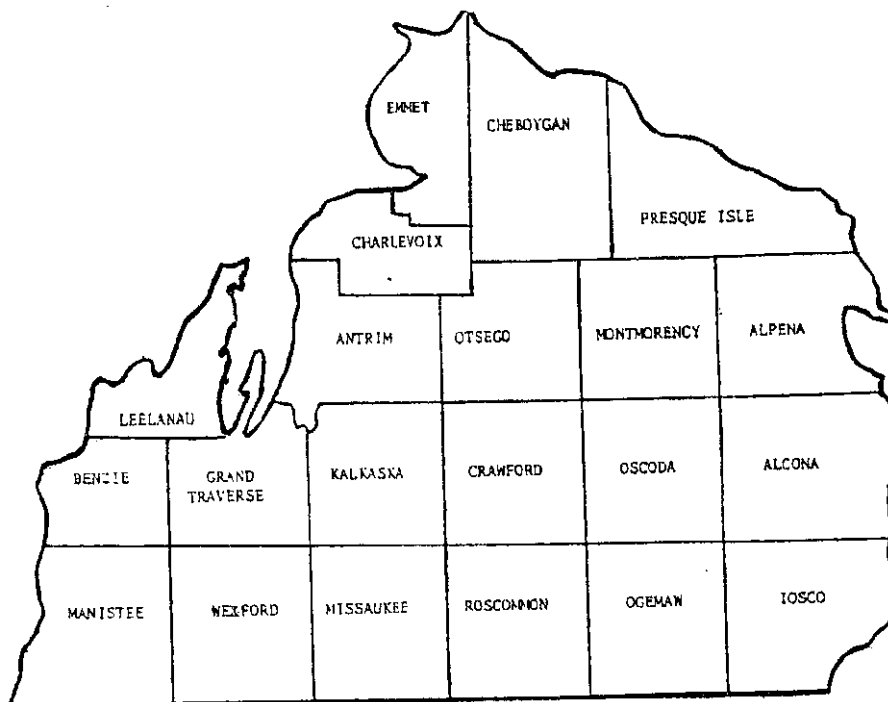


# EXHIBIT 1

**Exhibit 1**

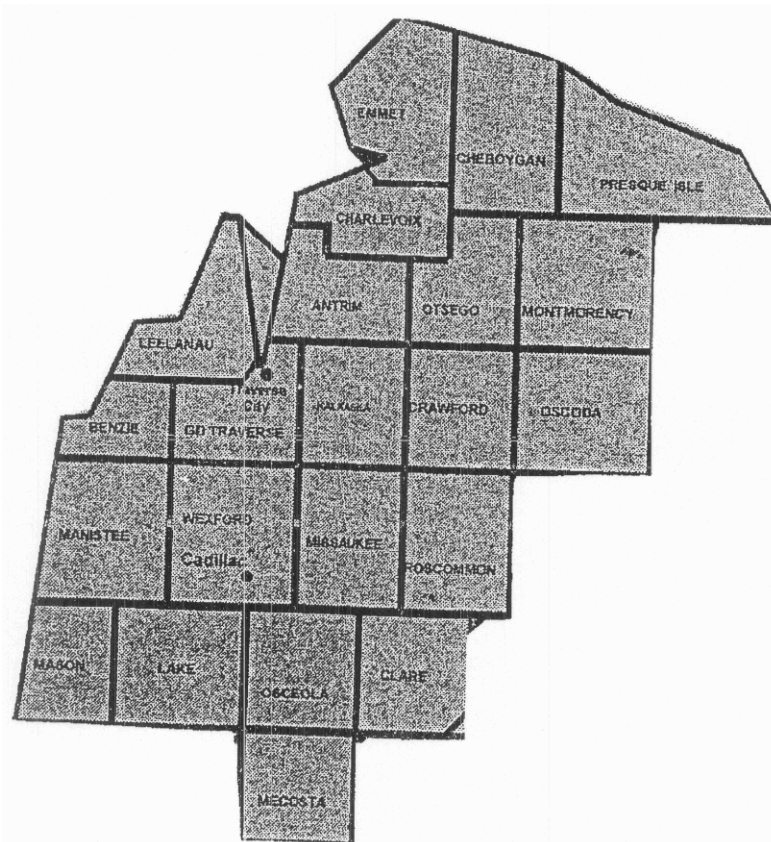
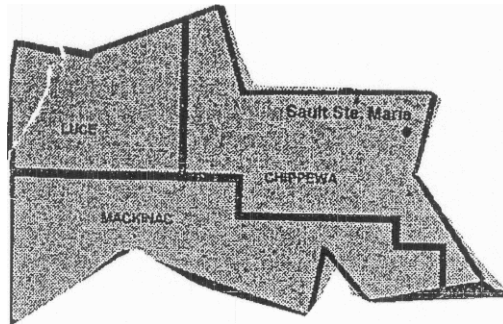
**Territory of the Roman Catholic Diocese of Gaylord**



# EXHIBIT 2

**Exhibit 2**

**Territory of the Traverse City-Cadillac DMA**



# EXHIBIT 3

### **Exhibit 3**

## **Excerpt from “Guidelines for Televising the Liturgy”**

Given the communal nature of liturgical prayer, it may, at times, be preferable to televise some forms of prayer other than the eucharist, such as Morning or Evening Prayer, a Liturgy of the Word, or Scripture services. However, when a liturgy (especially the Sunday Mass) is to be televised, the following guidelines are suggested:

### **1. Responsibility of the Diocesan Bishop**

The bishop of a diocese in which a televised Mass is produced has the responsibility to see that liturgical law is carefully observed, especially regarding the liturgical feasts and seasons, the use of approved liturgical texts and translations of Scripture, proper vesture, and ministers fulfilling their proper roles in the liturgy. Since these telecasts often cross diocesan lines, collegial responsibility should be exercised by the bishops involved (*SC, #22 and Inter Mirifica, #20*).

### **2. Live vs. Pre-recorded Celebrations**

Whenever possible, the liturgy should be telecast live. When this is not possible, consideration may be given to pre-recording the liturgy. A liturgy that is pre-recorded for delayed telecast should be taped as it is celebrated in a local worshiping community and then be telecast at a later time on the same day. Only when neither of these options is possible, should the liturgy be taped in advance in a setting other than a regularly scheduled liturgy celebrated by a local worshiping community. In order to reflect the integrity of the liturgical year, a pre-recorded liturgy should be taped on a date as close as possible to the date of the actual telecast. In order to preserve the sacred character of the liturgical celebration, only one liturgy should be recorded on a given day with the same group of people.

### **3. Time Constraints**

The celebration of the liturgy should not be rushed, nor should elements of the liturgy be omitted. Those responsible for planning, production, and presiding need to be sensitive to the requirements of the liturgy as well as the time constraints of television. For the integrity of the liturgy, those who produce the televised liturgy should be discouraged from editing out parts of the Mass (e.g., the Gloria, one of the readings). Planning and the careful choice of options can help to keep the celebration within the particular time frame.

### **4. The Assembly**

No other single factor affects the liturgy as much as the attitude, style, and

bearing of the celebrant (*Music in Catholic Worship*, #21). Therefore, the priest who is to preside at a televised liturgy should be carefully chosen and properly prepared. Since the liturgy is the work of Christ and the work of God's people, the televised Mass should always be celebrated within a living community of God's people whose presence reveals the full, conscious and active participation of the faithful. Even when the liturgy to be televised is taped apart from a regularly scheduled parish liturgy, there should always be a group of people who participate in the liturgy as fully as possible by their prayer, song, and presence.

#### **5. The Word**

Whenever possible, the Word of God should be proclaimed in its entirety. When time is a concern, the short forms in the *Lectionary* may be used. Since the homily is an integral part of the liturgy and necessary for the nurturing of the Christian life, there should always be a homily for the televised Sunday Mass (*GIRM*, #41). The homilist needs to be sensitive to the needs of the gathered assembly and of those who will be viewing the telecast.

#### **6. Music**

Music is very important in televising liturgical celebrations. The televised Mass, especially on Sunday, should normally include the sung acclamations; i.e., Alleluia, Holy, Holy, Memorial Acclamation, Great Amen. Ideally, the responsorial psalm should also be sung. Other appropriate songs may be sung as time permits. Additional musical selections should correspond to their placement in the liturgy and not simply be used as occasions for performance. The use of pre-recorded music, even to accompany the congregation's singing, is not appropriate for the liturgy (*Music in Catholic Worship*, #54 and *Liturgical Music Today*, #60).

#### **7. Liturgical Environment**

When using a setting other than a church or chapel, every effort should be made to create an environment which is fitting and conducive to the celebration of the liturgy (*GIRM*, #253). Provision should be made for proper vesture, worthy vessels, appropriate liturgical furniture, suitable musical instruments, and an arrangement of the liturgical space that encourages a reverent posture and attitude of the participants.

# EXHIBIT 4

CGB-CC -0270

Diocese of Gaylord

Request for Exemption from Closed Captioning Rules 606 North Ohio Avenue  
Gaylord, Michigan 49735-1999

Exhibit 4

May 4, 2007

Marlene H. Dortsch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: CGB-CC-0270  
Diocese of Gaylord Petition for Exemption from Closed Captioning Rules

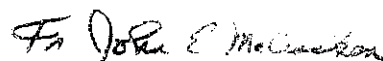
My name is Father John McCracken and I am the rector of the St. Mary Cathedral in Gaylord, Michigan. I am also the main presider of the Mass that is televised throughout the diocese every Sunday morning,

When I learned that the Diocese of Gaylord would be video-taping the Saturday evening Mass, editing it immediately after the Mass, and sending it to the television station for broadcast the next day, I did not realize the impact that this Mass would have on the many individuals who view it every Sunday. Since we have been broadcasting from the Cathedral I have received many letters and emails commenting on how people feel connected to the Church through their participation and viewing of this Mass. Many of them are homebound due to chronic illness and age. A number of individuals have written to tell me that when they were in the hospital recovering from surgery it was beneficial for them to view the Mass on Sunday morning during their hospital stay.

One of the significant aspects of this televised Mass, is that it is live, not a "canned" Mass. The actual celebration of our parish Saturday evening Mass, I believe, helps folks feel connected to a real parish, and not a "studio parish". I am amazed how many people will write to me commenting on the homily that I had given on a particular Sunday. I do not write out my homilies -- in fact, I have never done so for the past twenty-seven years. It is outlined mentally in my head, and given without notes. I do this because in my first year of being a priest I discovered that my mental outlines and written outlines vary greatly,

The televised Mass from the Cathedral touches the lives of many individuals, both Catholic and non-Catholic, and I would hate to see anything that would prevent this ministry of outreach from continuing.

Very sincerely yours,



Rev. John McCracken  
Rector

# EXHIBIT 5

**Exhibit 5**

**From:** EEG Sales  
**To:** Candace Neff  
**Subject:** Re: Encoder

Hello Candace,

Thank you for contacting EEG. If you wish to caption in real time you and you are at the facility where the program is originating you can use the EEG EN370DT (\$3,090.00) encoder. It is a desktop encoder with no modem. You will be able to connect the caption computer via the serial port? This is assuming you have a caption system which usually consists of a PC with Caption software,? and the steno keyboard *to* enter the data? Same would occur from a NLE editing system, You would be able to caption the final dub tape by inputting video *to* the encoder then outputting the final dub to a second master deck.

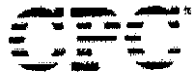
The software is called MacCaption for Mac or CaptionMaker for a PC.

Hope this helps  
Eric

# Prices

## **Caption Encoding Software (OS 9 and Win) CCaption**

CCaption-NLE V5.1 For Mac OS 9 and Win XP - **\$1,995**



**CPC Computer Prompting & Captioning Co.**  
1010 Rockville Pike, Suite 306  
Rockville, MD 20852, USA

**Candace Neff****From:** Gateway Customer Service [support@gateway.com]**Sent:** Monday, May 07, 2007 11:26 AM**To:** Guest**Subject:** Confirming Your Gateway Quote

Guest

Your recent Gateway quote has been successfully saved. You can now access this saved quote for the next 30 days. During that time, you can use your quote to make a purchase.

**Quote Details**

Quote #	55065	Creation Date:	0510712007 10:25 AM CT	
Quote Name:	cneff@dioceseofgaylord.org	Expiration Date:	06/06/2007 10:25 AM CT	
Product Description	Product #	Quantity	Unit Price	Price
Gateway@FX530XT	1014388R	1	\$4,059.96	\$4,059.96
Instant Discount (reflected in unit price, limited-time offer)			-\$300.00	

**System Components**

Genuine Windows Vista™ Home Premium (32-bit)

Intel® Core™ 2 Extreme Quad-Core Processor QX6700 (3.20GHz, 1066MHz FSB, 2x4MB cache. Factory Overclocked)

2048MB 667MHz Dual-Channel DDR2 SDRAM (2-1024MB modules)

300GB 10,000rpm Serial ATA 150 hard drive w/ 16MB cache &amp; Raid 0 (2-150GB hard drives)

Gateway 24 Widescreen HD Performance LCD Display

16x/48x DVD-ROM Drive

16x Double-Layer Multi-Format DVD Writer DVD±R/RW/CD-R/RW

NVIDIA GeForce 8800GTX w/ 768MB, Dual DVI-I Dual link TV Out (Factory Overclocked) w/ VGA adapter

Sound Blaster® X-Fi PCI Card

9-in-1 Memory Card Reader

Logitech® X-230 2.1 32 watt Speakers

Microsoft® Office Basic Edition 2007 (includes Word, Excel and Outlook) **[\$129.99]**

Cyberlink Power2Go (Download only)

Energy Star Compliant

Gateway@7-bay BTX tower case

Intel® 975X Chipset with DDR2 Support and Intel® Core™ Duo support

FX Logo Accent - Black Steel

(3) PCI Expansion Slots, (1) PCI-E x4 Expansion Slot, (1) PCI-E x16 Expansion Slot,

(7) USB 2.0 (2 in front, 1 in media card reader and 3 in back), (3) IEEE 1394 Firewire (2 in front and 1 in back), (7) PS/2, (1) Microphone, front audio ports

90-day America Online® internet access

Gateway® Elite Keyboard (for Genuine Windows® Vista™)

56K PCI data/fax modem

Intel® 975X Chipset with DDR2 and Intel® Core™ Duo support for QX6700 Overclocked Processors

5/7/2007

Soft-touch USB Optical Wheel **Mouse**  
Integrated Intel® 10/100/1000 (Gigabit) Ethernet  
Genuine Windows Vista™ Home Premium Backup Media (32-bit)  
700-Watt Power Supply  
McAfee® 36-month Internet Security Suite with VirusScan, Personal Firewall Plus, SpamKiller & Privacy Service v 1.2 (for Genuine Windows Vista™) **[\$99.99]**  
End User License Agreement for Non-Microsoft Software  
3 Year Value Plus Plan (Tech Support - Parts - At Home Service) **[\$129.99]**

**Quote Estimate: \$4,059.96**

Prices do not include shipping and handling or any applicable **taxes**. Quote based on current system and part availability and is subject to change without notice or obligation.

If you're ready to buy, you can [view your quote details](#) to get started. You can still make changes to your order when you proceed to the shopping cart for final purchase.

Your Friends at Gateway

Prices shown are inclusive of all discounts calculated. Sale subject to Limited Warranty and Terms & Conditions agreement, which is available by visiting Gateway.com or calling 1-800-846-2000 for a free copy. Prices, promotions, specifications, availability and terms of offers are for U.S. end users only, not resellers, distributors or non-U.S. purchasers, and may change without notice or obligation.

© 2006 Gateway, Inc. All rights reserved. Gateway terms and Conditions of sale apply. Not responsible for typographical errors. Gateway, Inc. is located at 7565 Irvine Center Dr, Irvine, CA 92618-2930. For sales assistance or customer service, Please call 888-888-2074. Find out information about Gateway's [privacy policy](#).

5/7/2007



**The Video Source**  
800.952.1815 / 212.444.6708

[Login/Register](#) [My Account](#) [Track Order](#) [Help Center](#)

**Search**

Products

Audio Professional    Binoculars 5 Scopes    Books & Tutorials    Cameras & Photo Gear    Computers 5 Solutions    Darkroom Equipment    Digital Photography    Film, Tapes 5 Media    Lighting & Studio    Portable Entertainment    Projection 5 Viewing    Underwater Equipment    Video Consumer    Video Professional    Used Equipment    Item Total:

Shop now using



## My Cart

**Enjoy No Payments for up to 30 days with B&H MeLater**

**Help Center:**

[Contact Us](#)

[Return & Exchange](#)

[Sales Tax](#)

[Hours of Operation](#)

[More Help Info.](#)

[Shipping Information](#)  
[Our Return Policy](#)  
[Your Privacy and Security](#)

[Update Cart](#)

[Continue Shopping](#)

[Checkout](#)

**Resources:**

[Upcoming Events](#)

[Request Our Catalogs](#)

[The N.Y. Super Store](#)

[Product Resources](#)

[B&H Newsletter](#)

[Affiliate Program](#)

[Gift Cards](#)

[Open Box Specials](#)

[Rebates & Promotions](#)

Sign up for B&H news and special offers

Enter Email Address

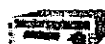
[Register Now](#)



**HACKER SAFE**  
TESTED 07-MAY

**Please note the lower price for the Sony 1-10 Compact VTP f/Beta Formats is \$5,999.95**

## Items



### Sony

J-10 Compact Video Tape Player for Betacam, Beta SP and Beta SX . . . MFR #J10 . . . B&H #SQJ10

**Our Price:**  
**\$5,999.95**

**Sub Total:**  
**\$ 5,999.95**

**Quantity:** 1 **Remove:** [X](#)

[View All Series](#)

[Update Cart](#)

[Continue Shopping](#)

[Checkout](#)

**Calculate Shipping/Tax**  
(zip code is required For USA)

zip Code:

country:  
USA

[Calculate Shipping](#)

### Order Total

**Sub Total:** **\$5,999.95**

**Shipping:** Enter zip code

**Tax:** Enter zip code

**Total:** **\$ 5,999.95**

**Recommended Accessories for the 1-10 Compact VTP f/Beta Formats.**  
To add accessories check the ☐ then click the Add To Cart button.

[Add](#)

**Comprehensive**  
3-BNC Male to 3-BNC Male  
Component Cable - 10 ft

MFR# 13P-3BP-10HR  
B&H# CQC3B3B1C

Quantity:

<http://www.bhphotovideo.com/bnh/controller/home?O=productlist.jsp&A=cart&Q=add&sk...> 5/7/2007

# EXHIBIT 6

## Exhibit 6

*Caption Mic Broadcast* comes with –

### Desktop PC and accessories

Custom configured desktop PC that meets all the requirements to run *Caption Mic Broadcast*. The PC runs the *Caption Mic* software and feeds caption data to the line 21 caption encoder (the ITVinjector).

### Caption Mic software

Real-time voice generated caption display software.

### ITVinjector

Encodes line 21 closed caption data into the VBI of the program video signal. Receives caption data via LAN. Also has inputs for newswire computer feeds.

### Andrea headset

Contains a microphone in pick-up captioner's voice. Also contains an ear-piece for monitoring program audio.

### CD-RW disk;

Two preformatted CDs for backing up data.

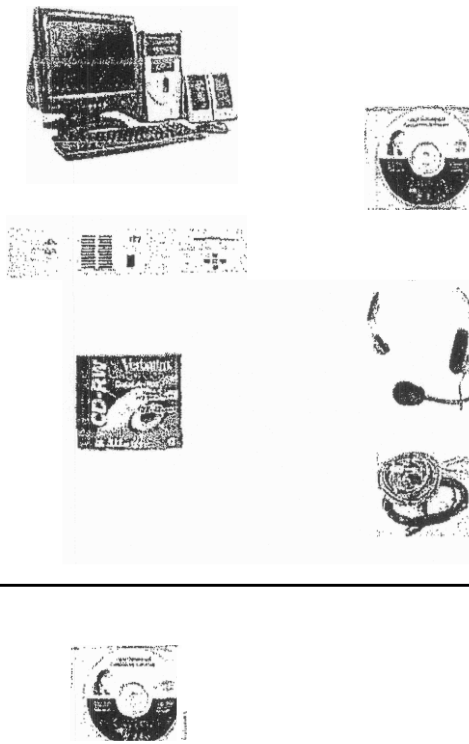
Cables, adapters, Quirk Start Guide, User's manual on CD

Everything you need to interconnect and operate the various *Caption Mic* components.

## Options

### Caption Wrap

Post production software that enables you to create videotape productions from your *Caption Mic* sessions. Provides editing and line 21 caption encoding capability in conjunction with a closed caption encoder.



## Who we are

ULTECH is a developer of innovative products that improve the accessibility of media and communications through technology. Applications addressed by the company include closed captioning, subtitling, voice captioning, and Interactive TV. Founded in 1991, ULTECH operated as an independent company until 2002 when it became a wholly owned company of the National Captioning Institute Foundation. ULTECH markets primarily to the government, education, broadcast, post production and media services industry.

## Voice captioning roadmap

ULTECH is committed to continually developing and improving Voice Captioning technology. The company plans to release several significant enhancements to the *Caption Mic* system over the next few years.

## Ordering Information

Choose either English or Spanish language. Additional languages or headset microphones may be ordered separately.

CM-broad-Engl	Caption Mic Broadcast package, English .....	\$10,695
CM-broad-Span	Caption Mic Broadcast package, Spanish .....	10,695
OPT31	Additional Andrea headset .....	80
OPT32	English language add-on .....	1,850
OPT33	Spanish language add-on .....	1,850
Cap-Wrap	Caption Wrap post production software .....	2,100

Warranty: one year parts and labor

Toll Free Order Hotline

888-360-0010

ULTECH Inc. 1255 Middlebury Road, Middlebury, CT 06762 USA  
Tel: (203) 753-8667, Fax: (203) 753-8693, www.ultech.com



**800.952.1815 / 212.444.6708**

[Login/Register](#) [My Account](#) [Track Order](#) [Help Center](#)

**Search**

[Products](#)

[Audio Professional](#)

[Binoculars & Scopes](#)

[Books & Tutorials](#)

[Cameras & Photo Gear](#)

[Computers & Solutions](#)

[Darkroom Equipment](#)

[Digital Photography](#)

[Film, Tape & Media](#)

[Lighting & Studio](#)

[Portable Entertainment](#)

[Projection & Mewing](#)

[Underwater Equipment](#)

[Video Consumer](#)

[Video Professional](#)

[Used Equipment](#)

[Items Total:](#)

**Shop now using**



## My Cart

**Enjoy No Payments for up**

with **PayMeLater**

### Help Center:

[Contact Us](#)

[Return & Exchange](#)

[Sales Tax](#)

[Hours of Operation](#)

[More Help Info...](#)

### Resources:

[Upcoming Events](#)

[Request Our Catalogs](#)

[The N.Y. Super Store](#)

[Product Resources](#)

[B&H Newsletter](#)

[Affiliate Program](#)

[Gift Cards](#)

[Open Box Specials](#)

[Rebates & Promotions](#)

**Sign up for B&H news and special offers**

**Brasil**

**HACKER SAFE**  
TESTED 07-MAY

Please note the lower price for the Sony J-10 Compact VTP f/Beta Formats is \$5,999.95

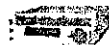
[Shipping Information](#)  
[Our Return Policy](#)  
[Your Privacy and Security](#)

[Update Cart](#)

[Continue Shopping](#)

[Checkout](#)

### Items



#### Sony

J-10 Compact Video Tape Player for Betacam, Beta SP and Beta SX ... MFR #110 • B&H #50110

**Our Price:**

\$5,999.95

**Sub Total:**

\$ 5,999.95

**Quantity:**

1

**Remove:**

[-](#) [+](#)

[View Accessories](#)

[Update Cart](#)

[Continue Shopping](#)

[Checkout](#)

**Calculate Shipping/Tax**  
(zip code is required For USA)

**Zip Code:**

**Country**

USA

[Calculate Shipping](#)

### Order Total

**Sub Total:** \$ 5,999.95

**Shipping:** Enter zip code

**Tax:** Enter zip code

**Total:** \$ 5,999.95

**Recommended Accessories for the J-10 Compact VTP f/Beta Formats.**  
To add accessories check the box then click the Add To Cart button.

[Add](#)

**Comprehensive**  
3-BNC Male to 3-BNC Male  
Component Cable - 10 ft

MFR# COP-3BP-10HR  
B&H# C0C3B3B15

**Quantity:**

# EXHIBIT 7

**Exhibit 7**

---

**From:** Sundown Padget [spadget@dioceseofgaylord.org]

**Sent:** Tuesday, March 20, 2007 9:08 AM

**To:** 'Candace Neff'

Hi Candy!

We received a phone call from a gentleman today who wanted to let us **know** how much he appreciates that the mass at St. Mary is televised. He has trouble getting out and is far more comfortable at home. Thought you'd like to hear a "thanks" for all your hard work

suzy

**Candace Neff**

---

**From:** ngoutziers [ngoutziers@charter.net]  
**Sent:** Thursday, April 12, 2007 5:21 PM  
**To:** cneff@dioceseofgaylord.org  
**Subject:** visit  
**Follow Up Flag:** Follow up  
**Flag Status:** Red

Hello, We would like to come and visit your beautiful church  
My wife and I watch your services every Sunday morning.  
She has trouble walking so We watch your services all the  
time.

Would it be possible now that the weather is getting better  
To send us a map where the church is located.

We live in Arcadia and like to drive up to attend your services.

Would it be possible to meet Father McCracken?

Thank you so much.

Nick J Goutziers.

3450 State

Arcadia, MI, 49613

231-889-5535

**Candace Neff**

---

**From:** ngoutziers [ngoutziers@charter.net]  
**Sent:** Friday, April 13, 2007 2:43 PM  
**To:** Candace Neff  
**Subject:** RE: visit

Dear Candace. We will try to make it for next Saturday.

My wife Mary will be 81 in May and has trouble getting around.

So if all goes well we will be there next Saturday and still gives us time to get home. She likes to sleep in her own bed.

Thank you so much for your kind invitation.

Nick.

from arcadia we send our love.

**Candace Neff**

---

**From:** ngoutziers [ngoutziers@charter.net]  
**Sent:** Wednesday, April 18, 2007 5:25 PM  
**To:** Candace Neff  
**Subject:** RE: visit

Hello Candace, Mary and I will not be able to make it this week. Mary is not feeling good. We will try to make it next week. God Bless you for your kind words.

3701 W Cheney Rd.,  
Maple City, MI 49664  
December 18, 2006.

Dear Father McEachern,

On August 1 of this year I had surgery for the total rebuilding of my left knee, and, was homebound for about six weeks. Prior to this time, preparing to go to church, we had watched your program on TV before we left home.

During that six weeks, though, the Reserved Sacrament was brought to our home, we wanted the experience of being present at the celebration of the Holy Eucharist, as my wife and I watched the Mass from St. Mary's. We felt right at home

now, having returned to Church, on Sunday, we are trying that part of the Service that includes your sermons. Because both of us are so impressed, that we listen to them after we return home each

Sunday. Your parishioners are indeed fortunate to have such a wonderful Priest.

Enclosed is a small check made out to "Catholic Services Appeal", to assist in the continuation of this Ministry.

As soon as the condition of my knee will allow, (hopefully soon) I intend to return to the Altar to resume celebrating the Holy Eucharist myself.

Sincerely,

Fr. Ted Lowry - Retired Priest  
Assisting at Grace Episcopal  
Church, Brownsville,

(8)

April 15 , 2007

Dear Father John,

You surely do still "Have it"/ Every Sunday we watch you and listen to you.

You **are** our direct connection to Jesus. Thru your caring words you **helped us** "see and feel", reaffirming again what we know and believe. If ever you doubt the effectiveness of these broadcasts Don't !! I still have "goosebumps" thinking about your homily. Jim says " **tie** just gets better every Sunday."

We live at Glen Eagle in Traverse City – a retirement home . When the weather is bad you are our direct connection to church, along with Deacon Rene from St. Patrick Church. He visits us during the week—reads the readings of the week and gives us Holy Communion. He is a very fine man and very devoted and faithful in providing this service to those of us who have difficulty getting to church.

It gives **us** such pleasure and comfort to **see** and hear you regularly/. We are reminded of our happy carefree days at St. James Church and Higgins Lake. Our daughter Lynne and husband Bob Fryc still live at Higgins Lake—Cross -country Ski Headquarters. **Our** daughter Karen Grost Taylor and son Eric Grost live in Traverse City. (they tune into you occasionally also).

Life is good here –just different. Many of our new friends lead inspiring lives despite infirmity and are constant encouragement to **us all** – that God really does provide us with strength and hope to deal with life's surprises.

We thank you for your messages of faith each week—they **truly** recharge  
our“batteries”~ We have enclosed a donation to **support** the Sunday Morning  
television broadcasts from the Gaylord Cathedral.

Fondly,

*Jim and Inge Grost*

Jim and Inge Grost

3950 Sumac Drive Apt. 230

Traverse City, Michigan 49684

231 - 922-2554

# EXHIBIT B

## EXEMPTIONS TO THE CLOSED CAPTIONING REQUIREMENTS ON THE BASIS OF UNDUE BURDEN

In addition to the self-implementing exemptions from the closed captioning rules (found in 47 C.F.R. § 79.1(d)), the Commission's **rules** provide procedures for petitioning the Commission **for** an exemption from the rules where compliance with the rules will result in an undue burden (47 C.F.R. § 79.1 (f)). **The** term "undue burden" means significant difficulty or expense. Exemptions may **be** granted, in whole or in part, for a channel of video programming, a category **or** type **of** video programming, **an** individual video service, a specific video program, or a video programming provider, upon a finding that the closed captioning requirements will result in an undue burden. A petition for an exemption must be supported by sufficient evidence to demonstrate that compliance with the closed captioning requirements would cause an undue burden. Petitions must **also** be supported by an affidavit. This is the only process to **seek** a waiver or exemption of the closed captioning rules.

Factors the Commission will consider when determining whether the requirements for closed captioning impose an undue burden include the following:

- The nature and cost of the closed captioning for the programming
- The impact on the operation of the provider or program owner  
The financial resources of the provider or program owner, including efforts to solicit captioning assistance from the distributors of its programming and the distributors' responses (*See* ¶ 204 of 1997 R&O.)
- The type of operations of the provider or program owner
- **Any** available alternatives that might constitute a reasonable substitute for the closed captioning requirements, including but not limited to, text or graphic display of the content of **the** audio portion of the programming (*See* ¶ 201 of 1997 R&O.)
- Other factors the petitioner deems relevant to the Commission's final determination.

Undue burden shall be evaluated with regard to the individual outlet. We encourage petitioners to propose **alternative implementation** schedules or benchmarks that could minimize the burden of compliance with the rules, but would increase the amount of captioning available for their viewers.

Discussion about the undue burden petition standard and process is found in paragraphs 182-205 of **the** 1997 Report and Order  
<http://www.fcc.gov/Bureaus/Cable/Orders/1997/fcc97229.txt> and paragraphs 108-112 of **the** 1998 Reconsideration Order  
[http://www.fcc.gov/Bureaus/Mass\\_Media/Orders/1998/fcc98236.pdf](http://www.fcc.gov/Bureaus/Mass_Media/Orders/1998/fcc98236.pdf)

Please note that pursuant to Commission rules, the petition, ~~as~~ well as any supporting financial information provided, will ~~be~~ available for public inspection in the Commission's Reference Information Center. The Commission endeavors to make this available on its website, as well. **As such, petitioners should redact social security numbers and employee identification numbers from their submissions.** Petitioners requesting confidential treatment of any information contained in a petition must specifically request such treatment in writing. Please note, however, that the "public version" of the petition must contain sufficient documentation to support the petitioner's claim that closed captioning **would pose** an undue burden.